

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF NEW YORK

<b>UNITED STATES OF AMERICA</b>	)	Criminal No.	1:23-CR-451 (GLS)
	)		
<b>v.</b>	)	<b>Information</b>	
	)		
<b>SCOTT SOLOMON,</b>	)	Violations:	18 U.S.C. § 1344
	)		[Bank Fraud]
	)		
	)	2 Counts & Forfeiture Allegations	
	)		
<b>Defendant.</b>	)	County of Offense:	Albany

**THE UNITED STATES ATTORNEY CHARGES:**

**COUNT 1**  
**[Bank Fraud]**

On or about April 4, 2020, in Albany County in the Northern District of New York, and elsewhere, the defendant, **SCOTT SOLOMON**, knowingly executed a scheme and artifice to defraud a financial institution, and to obtain monies, funds and assets owned by, and under the custody and control of, a financial institution, by means of false and fraudulent pretenses and representations, in that **SCOTT SOLOMON** knowingly submitted a false and fraudulent Paycheck Protection Program loan application to Customers Bank, the deposits of which were then insured by the Federal Deposit Insurance Corporation, in violation of Title 18, United States Code, Section 1344(1) and (2).

**COUNT 2**  
**[Bank Fraud]**

On or about June 22, 2020, in Albany County in the Northern District of New York, and elsewhere, the defendant, **SCOTT SOLOMON**, knowingly executed a scheme and artifice to defraud a financial institution, and to obtain monies, funds and assets owned by, and under the custody and control of, a financial institution, by means of false and fraudulent pretenses and

representations, in that **SCOTT SOLOMON** knowingly submitted a false and fraudulent Paycheck Protection Program loan application to Quontic Bank, the deposits of which were then insured by the Federal Deposit Insurance Corporation, in violation of Title 18, United States Code, Section 1344(1) and (2).

#### **First Forfeiture Allegation**

The allegations contained in Count One of this information are hereby re-alleged and incorporated by reference for the purpose of alleging forfeiture pursuant to Title 18, United States Code, Section 982(a)(2). Upon conviction of the offense charged in Count One of the information, in violation of Title 18, United States Code, Section 1344, the defendant, **SCOTT SOLOMON**, shall forfeit to the United States of America, pursuant to Title 18, United States Code, Section 982(a)(2), any property constituting, and derived from, proceeds obtained directly and indirectly, as the result of such violation. The property to be forfeited is a money judgment in the amount of \$87,500, representing the unrecovered proceeds personally obtained by the defendant as a result of the offense of conviction.

#### **Second Forfeiture Allegation**

The allegations contained in Count Two of this information are hereby re-alleged and incorporated by reference for the purpose of alleging forfeiture pursuant to Title 18, United States Code, Section 982(a)(2). Upon conviction of the offense charged in Count Two of the information, in violation of Title 18, United States Code, Section 1344, the defendant, **SCOTT SOLOMON**, shall forfeit to the United States of America, pursuant to Title 18, United States Code, Section 982(a)(2), any property constituting, and derived from, proceeds obtained directly and indirectly, as the result of such violation. The property to be forfeited is a money judgment

in the amount of \$76,493, representing the unrecovered proceeds personally obtained by the defendant as a result of the offense of conviction.

Dated: December 11, 2023

CARLA B. FREEDMAN  
United States Attorney

By:

A handwritten signature in blue ink, appearing to read "Michael Barnett", is written over a horizontal line.

Michael Barnett  
Assistant United States Attorney  
Bar Roll No. 519140